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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**LISAMARIA MARTINEZ,**

Plaintiff,

v.

**COUNTY OF ALAMEDA, ,**

Defendant.

Case No. 3:20-cv-06570-TSH

**SECOND JOINT STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
DEADLINE FOR PLAINTIFF'S  
MOTION FOR ATTORNEYS' FEES**

**SECOND JOINT STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF'S  
MOTION FOR ATTORNEYS' FEES**

With the Court's approval, the Parties previously stipulated to extend the deadline for Plaintiff to file a Motion for Attorneys' Fees by 7 days, to June 30, 2025 (*See* Order Extending Deadline for Plaintiff's Motion for Attorneys' Fees, ECF No. 220).

Plaintiff has shared preliminary data about the fee claim with Defendant. The Parties now believe it would be in the best interest of the Court's time and resources to allow the Parties further time to negotiate over a potential settled resolution of the fee claim. Both Parties believe 90 days will allow further sharing of relevant information between the Parties. Defendant also anticipates needing these 90 days to brief and receive direction from the Board of Supervisors.

As such, the Parties have agreed to enter this joint stipulation for the Court to extend the filing deadline for Plaintiff's Motion for Attorneys' Fees to Monday, September 29, 2025.

Respectfully submitted,

DATED: June 25, 2025

TRE LEGAL PRACTICE

/s/ Timothy Elder

Timothy Elder

*Attorneys for Plaintiff*

DATED: June 25, 2025

ORBACH HUFF & HENDERSON LLP

/s/ Nicholas D. Fine

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